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 DIVISION OF OIL, GAS AND MINING

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April 3, 2001

TO: [REDACTED]

FROM:

Peter Hess, Reclamation Specialist III, Team Lead, Engineer

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RE:

Map 18A, Plateau Mining Corporation, Willow Creek Mine, 8005/038-AM01C

SUMMARY:

The permittee submitted revised Map 18A, "Willow Creek Mine, Pre-mining Surface Topography" on March 9, 2001, which was received in the Salt Lake office on March 12, 2001. This was necessary to address a deficiency found in a technical memo authored by Mr. Wayne Western dated January 17, 2001. The only revision necessary to Map 18A was a change in the "pre-SMCRA" disturbed area NE of the initial up grade of the School House Canyon refuse disposal facility primary access road. The area initiates on the South corner of Barn Canyon and travels nine hundred feet to the SE, terminating on the SW corner of the permit boundary (at the first major turn in the access road) in the School House Canyon area. The areas dimensions vary from a maximum plan view width of seventy feet to a zero width on both ends. An approximate acreage calculation would determine a size of 1.80 acres.

TECHNICAL ANALYSIS:

OPERATION PLAN

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

TECHNICAL MEMO

Mining facilities maps

"All maps and plans submitted with the permit application will distinguish among each of the phases during which coal mining and reclamation operations were or will be conducted at any place within the life of operations. At a minimum, distinctions will be clearly shown among those portions of the life of operations in which coal mining and reclamation operations occurred." Map 18A (revised) has been submitted to indicate that the cut slope in question was constructed prior to the development of the Willow Creek preparation plant area.

As noted in the summary, the submittal in its entirety consists of revised Map 18A, which shows "pre-mining" surface topography of the Willow Creek Mine with its associated disturbance, as well as the preparation plant with its associated facilities. The area in question is in the preparation plant surface facilities area, which occupies a portion of Price Canyon which was previously occupied by the town of Castle Gate, (dismantled in 1966). The permittee has provided information to confirm that the cut slope in question was constructed during the development of Castle Gate. The area consists of the nine hundred foot length of cut bank immediately adjacent to and NE of the initial grade of the School House Canyon coal processing and coal mine waste disposal area primary access road.

Based on an analysis of the surface contours, the vertical angle of this cut bank appears to be very close to 66 ½ degrees, or a one to two slope. The permit boundary line, as depicted on the **revised Map 18A**, delineates an area which varies from a few feet in width to a maximum of fifty feet (plan view) below the head of this pre-SMCRA cut slope. The area below the permit boundary delineation constitutes approximately 1.80 acres, assuming a vertical angle of 66 degrees thirty seven minutes, and a nine hundred foot bank length, varying zero to a maximum of seventy feet in width (plan view).

A UDNR/OGM technical memorandum authored on January 17, 2001 by Mr. Wayne Western, Senior Reclamation Specialist determined the pre-SMCRA Map 18A, which had been submitted and approved as part of permit amendment ACT/007/038-99H, incorrectly showed the initial upgrade of the School House Canyon access road to be outside of the pre-SMCRA disturbed area. In order to receive final approval, the UDNR/OGM required the permittee to submit a corrected Map 18A to show that the cut slope adjacent to the initial up grade of the School House Canyon access road was made pre-SMCRA. As noted previously a revised Map 18A has been submitted by the permittee which correctly shows that the cut slope adjacent to the School House Canyon initial up grade was made pre-SMCRA.

The permittee has adequately addressed the requirements of R645-301-142 and 142.100.

Findings:

The permittee has adequately addressed the requirements of **R645-301-142** and **142.100**.

RECOMMENDATIONS:

The permittee has submitted a revised map which correctly shows that the cut slope in the area in question was made pre-SMCRA. All R645 requirements relative to this approximate original contour determination have been adequately addressed.

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